

333 East Canal Drive • P.O. Box 949 • Turlock, CA 95381-0949

November 15, 2018

Via Electronic Mail Only

Mr. Walter Plachta, Engineering Geologist/Basin Planning Central Valley Regional Water Quality Control Board 1685 E Street Fresno, CA 93706

Email: walter.plachta@waterboards.ca.gov

Dear Mr. Plachta,

RE: 2018 Joint Triennial Review – Draft Workplan

The Turlock Irrigation District (TID) appreciates the opportunity to provide comments regarding the Central Valley Regional Water Quality Control Board's 2018 Joint Triennial Review of the Water Quality Control Plans for the Sacramento River and San Joaquin River Basins and Tulare Lake Basin ("Triennial Review") process. The resulting Draft Workplan describes the actions the Regional Board will take over the next three years to investigate and respond to issues. Throughout the Triennial Review process, the TID has encouraged the Regional Board to prioritize the development of effective, scientifically defensible temperature criteria and objectives in the San Joaquin River watershed.

TID appreciates the Regional Board including Project #11 "Temperature Criteria and Objectives", addressing Issue #7 "Protection of Central Valley Fisheries and other Aquatic Life" in the recently circulated Draft Workplan. TID is supportive of this project, and the ranking criteria used to assign a rank of "3" to the project. Projects ranked "3" are ranked highest amongst the projects listed that are not considered "special status" projects and projects that the Regional Board are legally obligated to complete. As noted on page 13 of the draft Workplan, proposed Project #11 complements prior Regional Board work, is a project of special stakeholder interest, and will support the Regional Board's efforts on climate change. As the Regional Board continues to consider the order of priority for implementing projects ranked 1 through 3 during future "Portfolio Management" processes, TID encourages the Regional Board and staff to continue to make Project #11a high-priority.

TID repeats its earlier offers to provide resources to assist the Regional Board's efforts to develop appropriate temperature criteria and objectives. Significant research and modeling have already been done for the Tuolumne River that will be helpful in the process. Please contact me if you have questions or would like more information.

Sincerely,

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AGM Water Resources

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